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*Attorney for Defendant The Commonwealth of the  
Northern Mariana Islands*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC**

**Plaintiff,**

**v.**

**COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS;  
COMMONWEALTH CASINO  
COMMISSION, ARNOLD PALACIOS,  
Governor of CNMI, in his official and  
personal capacities; EDWARD C. DELEON  
GUERRERO, Chairman of CCC, in his  
official and personal capacities; RAFAEL S.  
DEMAPAN, Vice Chairman of CCC, in his  
official and personal capacities; MARIANO  
TAITANO, Commissioner of CCC, in his  
official and personal capacities; MARTIN  
MENDIOLA, Commissioner of CCC, in his  
official and personal capacities; RAMON M.  
DELA CRUZ, Commissioner of CCC, in his  
official and personal capacities; and  
ANDREW YEOM, Executive Director of  
CCC, in his official and personal capacities.**

**Defendants.**

**CIVIL CASE NO. 1:24-cv-00001**

**The COMMONWEALTH OF THE  
NORTHERN MARIANA ISLANDS'  
MOTION TO DISMISS FIRST  
AMENDED COMPLAINT PURSUANT  
TO FEDERAL RULE OF CIVIL  
PROCEDURE 12(b)(1) and (6)**

Defendant, The Commonwealth of the Northern Mariana Islands, by and through its  
counsel of record, Chief Solicitor, J. Robert Glass, Jr., moves this Court to dismiss Plaintiff's  
First Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1) and (6). This

1 Motion is accompanied by a legal memorandum of points and authorities. *See* Local Rule  
2 7.1(b).

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4 Respectfully submitted: April 25, 2024

OFFICE OF THE ATTORNEY GENERAL  
EDWARD MANIBUSAN  
ATTORNEY GENERAL

6  
7 /s/ J. Robert Glass, Jr.  
J. ROBERT GLASS, JR. (F0523)  
8 Chief Solicitor

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10 **CERTIFICATE OF SERVICE**

11 I hereby certify that the above and foregoing was electronically filed on April 25, 2024, with  
12 service requested to all parties of record.

13 /s/ J. Robert Glass, Jr.  
14 J. ROBERT GLASS, JR. (F0523)  
15 Chief Solicitor  
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